

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**SECURITIES AND EXCHANGE  
COMMISSION,**

Plaintiff,

v.

**STANFORD INTERNATIONAL  
BANK, LTD., *et al.***

Defendants,

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Civil Action No.: 3:09-CV-0298-N

**PLAINTIFF’S MOTION FOR PARTIAL SUMMARY JUDGMENT**

Plaintiff Securities and Exchange Commission moves under Rule 56(a) of the Federal Rules of Civil Procedure for summary judgment against defendants R. Allen Stanford (“Stanford”), James Davis (“Davis”), Stanford International Bank, Ltd. (“SIB”), and Stanford Group Company (“SGC”) and asks the Court to enter an order holding each liable for each claim alleged against them by the Commission in the Second Amended Complaint and liable for disgorgement, prejudgment interest, and monetary civil penalties. [See Dkt. 952].<sup>1</sup> The Commission’s brief in support of this motion, which is filed contemporaneously herewith, sets out the elements of the offenses.

In addition, the Commission is filing on this same day an Appendix containing the factual materials that support this motion, in compliance with Rules 56.3(a)(2) and 56.6 of the Local Rules for the U.S. District Court for the Northern District of Texas. Citations to the evidence pursuant to Local Rule 56.5(c) are contained in the Commission’s brief in support.

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<sup>1</sup> The Commission is not seeking at this time partial summary judgment against Stanford Capital Management, Laura Pendergest-Holt, Gilberto Lopez, Mark Kurht, or Leroy King.

For the reasons set out in the accompanying brief and appendix, the Commission respectfully requests that the Court grant the Commission's Motion for Partial Summary Judgment.

Dated: February 19, 2013

Respectfully submitted,

s/ David B. Reece

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 19, 2013, I electronically filed the foregoing *Plaintiff's Motion for Partial Summary Judgment* with the Clerk of the court using the CM/ECF system which will send notification of such filing to all counsel of record.

s/ David B. Reece